

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; AMAZON.COM SERVICES LLC,  
a Delaware limited liability company; and  
NINTENDO OF AMERICA INC., a  
Washington corporation,

Plaintiffs,

v.

CHEN JING, and individual; ZHOU RONG, an  
individual; JINGJING SHAO, an individual,

Defendants.

No. 2:23-cv-01641-MJP

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' *EX PARTE* MOTION  
FOR DEFAULT JUDGMENT AND  
PERMANENT INJUNCTION AGAINST  
DEFENDANTS CHEN JING AND  
ZHOU RONG**

THIS MATTER came before the Court on the *Ex Parte* Motion for Default Judgment and Permanent Injunction (the "Motion") brought by Plaintiffs Amazon.com, Inc., Amazon.com Services LLC (collectively, "Amazon"), and Nintendo of America Inc. ("Nintendo," and with Amazon, "Plaintiffs") against Defendants Chen Jing and Zhou Rong (together, "Defendants"). The Court, having considered Plaintiffs' Motion, this matter's files and records, the governing law, and being fully advised, finds that Plaintiffs have established the liability of Defendants and their entitlement to damages and permanent injunction. Accordingly, the Court ORDERS:

1. Plaintiffs' Motion is GRANTED and JUDGMENT is entered against all Defendants on Nintendo's cause of action for Trademark Counterfeiting and Trademark

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*EX PARTE* MOTION FOR DEFAULT JUDGMENT  
AND PERMANENT INJUNCTION - 1  
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1 Infringement (15 U.S.C. § 1114), Plaintiffs' cause of action for False Designation of Origin (15  
 2 U.S.C. § 1125(a)), and Plaintiffs' cause of action for Violation of the Washington Consumer  
 3 Protection Act (RCW 19.86.010, *et seq.*), and Amazon.com Services LLC's cause of action for  
 4 Breach of Contract.

5 2. The Court awards Nintendo statutory damages in the amount of \$7,030,158 based  
 6 on Defendants' willful violations of the Lanham Act, as follows:

- 7 a. An award of \$705,963 against Chen Jing for counterfeit sales from the  
 8 following Selling Account: Blkei;
- 9 b. An award of \$6,276,543 against Zhou Rong for counterfeit sales from the  
 10 following Selling Accounts: (1) AmliboCards; (2) Chiaofushi; (3) Fyhale  
 11 Direct; (4) Jiadan-US; (5) Marsberg; (6) Srhdfbeygfjs; and (7) Xingfang;
- 12 c. An award of \$47,652 against Chen Jing and Zhou Rong, jointly and severally,  
 13 for counterfeit sales from the following Selling Account: Chengadahuo.

14 3. The Clerk is directed to enter judgment against Defendants and in favor of  
 15 Nintendo in the amounts set forth above.

16 4. Defendants and their officers, agents, servants, employees, and attorneys, and all  
 17 others in active concert or participation with them who receive actual notice of the order, are  
 18 hereby permanently ENJOINED AND RESTRAINED from:

- 19 a. selling counterfeit or infringing products in Amazon's stores;
- 20 b. selling counterfeit or infringing products to Amazon or any Amazon affiliate;
- 21 c. importing, manufacturing, producing, distributing, circulating, offering to sell,  
 22 selling, promoting, or displaying any product using any simulation,  
 23 reproduction, counterfeit, copy, or colorable imitation of Nintendo's brand or  
 24 trademarks, or which otherwise infringes Nintendo's intellectual property, in  
 25 any store or in any medium; and

d. assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs (a) through (c) above.

5. The Court hereby retains jurisdiction over this case for the purpose of enforcing this Order and Injunction, and for any supplemental proceedings that may be authorized by law.

6. Plaintiffs' counsel is hereby directed to provide notice of this Order and Injunction on Defendants via email as approved by the Court in its prior order for alternative service (Dkt. 24).

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
THE HONORABLE MARSHA J. PECHMAN  
UNITED STATES DISTRICT COURT JUDGE

Presented by:

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